

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ABDULRAHMAN ALHARBI,)
v. Plaintiff,)
GLENN BECK; THE BLAZE, INC.;)
MERCURY RADIO ARTS, INC.; and)
PREMIERE RADIO NETWORKS, INC.,)
Defendants.)
Civil Action
No. 14-11550-PBS

**PLAINTIFF'S MOTION IN LIMINE TO PRECLUDE
DEFENDANTS FROM INTRODUCING INFORMATION CONCERNING PLAINTIFF'S
SUBMISSION TO LIE DETECTOR TEST**

The Plaintiff moves the Court in accordance with Rule 104(a) of the Federal Rules of Evidence for entry of an order precluding the Defendants from attempting to introduce any evidence concerning the Plaintiff's submission to a lie detector test. In support of his motion, the Plaintiff states the following:

1. In this action, Plaintiff seeks to recover for damages he incurred as a result of the defamatory statements Defendants published after the Boston Marathon attacks on April 15, 2013, accusing Plaintiff, among other things, of being the "money man" who provided funding for the attacks.

2. In the course of discovery in this action, the Defendants have asked the Plaintiff whether he submitted to a "lie detector" test. The Plaintiff responded by stating that he was advised not to be counsel and followed that advice.

3. This testimony has no relevance to any facts at issue in this action. F.R.E 401.

4. Any such testimony also carries with it a high risk of unfair prejudice. F.R.E 403.

Wherefore, the Plaintiff prays that the Court enter an order precluding Defendants from attempting to introduce any evidence concerning the Plaintiff's submission to a lie detector test and that the Court grant such other and further relief as is just.

/s/ Peter J. Haley

Peter J. Haley (BBO # 543858)
Gregory J. May (BBO# 642646)
NELSON MULLINS RILEY & SCARBOROUGH LLP
One Post Office Square – 30th Floor
Boston, Massachusetts 02109-2127
Telephone: (617) 573-4700
Facsimile: (617) 573-4710
Email: peter.haley@nelsonmullins.com
greg.may@nelsonmullins.com

Dated: September 7, 2016

CERTIFICATE OF SERVICE

I, Peter J. Haley, hereby certify that on this 7th day of September, 2016 this pleading was served upon counsel to the Defendants in this action.

/s/Peter J. Haley
Peter J. Haley